

JPMorgan Chase Bank N.A is filing a Continuing Activity Report (CAR) to report cash deposits from an unknown source and check deposit activity indicative of the operation of a prohibited business (Escort Service) occurring in consumer checking account #198523802 held solely in the name of LIDIA PAVLOVA. The reportable activity consist of cash deposits from a unknown source which are conducted at multiple branch and ATM locations in Los Angeles and Beverly Hills, CA., along with incoming check deposits made payable to cash originating from JPMC client BARTON LOUIS BUCHALTER. The report will be filed in the amount of \$49,737.00 representing the above mentioned cash and check deposits occurring between the dates of 12/07/2017 and 02/05/2018.

This CAR is linked to prior SAR NA 69712330 which was filed on 12/15/2017 totaling \$81,225.00 for cash deposits from an unknown source and check deposit activity which is indicative of the operation of a prohibited business (Escort Service) between 08/10/2017 and 12/01/2017.

Consumer Checking Account 198523802 was opened on 08/10/2017 and is solely owned by LIDIA PAVLOVA who is a Non-Resident Alien from Russia currently residing in Los Angeles, CA. LIDIA PAVLOVA has been a client of JPMC since 08/10/2017 with bank records indicating the client is employed as a Freelance Photographer. However Account transactions revealed the client may also be operating as an Escort.

BARTON LOUIS BUCHALTER is a US citizen residing in Woodland Hills, CA and the owner and lawyer at BARTON LOUIS BUCHALTER ESQ. BARTON LOUIS BUCHALTER has maintained a relationship with JPMC since 10/28/2016.

The review found the following suspicious activity.

During the review of account #198523802, eleven (11) cash deposits were conducted totaling \$28,737.00 between the dates 12/07/2017 and 02/05/2018.. The cash deposits range between \$200.00 and \$6700.00. The cash deposits occurred branch and ATM in Los Angeles and Beverly Hills. Accompanying the cash deposits were four (4) check deposits totaling \$21,000.00 made payable to cash which originated from a BARTON LOUIS BUCHALTER's JPMC checking account number 700858611 and account 8000096225 drawn on Comerica Bank. These checks ranged between \$4000.00 and \$6,000.00.

Details of the transactions can be found in the attached CSV file.

LIDIA PAVLOVA was contacted per a request for information sent on 12/11/2017 to inquire about the multiple cash deposits and the incoming checks from BARTON LOUIS BUCHALTER. Per the inquiry request LIDIA stated she was a photographer and cash and checks were from clients.

Additionally BARTON L BUCHALTER was contacted per a request for information sent on 12/06/2017 to inquire about the checks. BARTON LOUIS BUCHALTER stated the checks made to cash were to his "Girlfriends". The inquiry dates will not be included in the suspicious date range.

Based upon contradicting inquires as to the purpose of the checks, same day and consecutive day cash deposits checks from a unrelated individual (BARTON LOUIS BUCHALTER) it appears subject LIDIA PAVLOVA is operating in a prohibited business as an escort and therefore the above mentioned cash and check deposits will be reported in the SAR filing.

In summary, JPMC is filing this CAR to report cash deposits from an unknown source and check deposit activity indicative of the operation of a prohibited business (Escort Service) totaling \$49,737.00. The aggregate amount of this report and the previous report totals \$130,962.00 and the cumulative suspicious activity period is between 08/10/2017 and 02/05/2018.

Supporting documentation associated with this report (SAR #: SAR\_NA\_80534661) includes, but may not be limited to, documents maintained or identified in case file # CASE\_AML\_NA\_63814758 and can be retrieved upon request. Upon the appropriate and validated request of a regulator or law enforcement agency, supporting documentation will be provided. SAR #: SAR\_NA\_80534661 Case #: CASE\_AML\_NA\_63814758